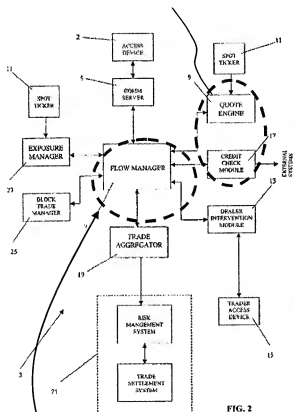Remarks:

Applicant thanks the Examiner for the courtesies extended during the July 8, 2010 personal interview in connection with this patent application during which time the amendments to the independent claims made herein were discussed with the Examiner.

The claims pending in this patent application at the time of the outstanding Office Action were claims 1-35, 82-86 and 91-98. By this amendment, Applicant has (1) amended claims 1, 4-6, 18-20, 22, 27, 30-35, 82 and 96-98 as proposed during the interview, and (2) canceled claims 2-3, 12-15 and 94-95 without prejudice. No new matter is present. The pending claims are now claims 1, 4-11, 16-35, 82-93 and 96-98. The independent claims are claims 1, 32 and 82.
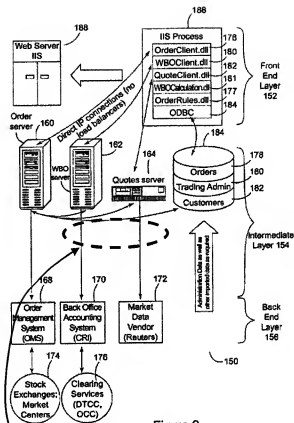
By this amendment to claim 1, Applicant has incorporated the recitations from dependent claims 94, 95, 2, 3 and 15 into independent claim 1 as shown in the enclosed claims listing. Applicant has further amended to claim 1 to recite that the intermediate layer servers (e.g., order servers, customer account servers, quote servers) are configured for direct interactions with each other through first, second and third load balancers as claimed. Exemplary support for these recitations can be found in Figures 2 and 3 of the patent application and their corresponding text. Similar amendments regarding the de-centralized communications between servers in the intermediate layer have been made to independent claims 32 and 82.

As discussed during the interview, the Mulinder reference, whether considered alone or in combination with the Garg reference, fails to disclose, teach or suggest a system that employs direct communications between services such as the "quote engine 9" and "credit check module 17". Instead, all traffic in the Mulinder system must flow through a centralized "flow manager 7" as shown in Figure 2 of Mulinder reproduced below. By contrast, the claimed invention recites a de-centralized peer-to-peer architecture where the order server(s), customer account server(s) and quote server(s) can all directly interact with each other. Illustrating this contrast is Figure 2 of the patent application, also reproduced below (see also Figure 3 of the patent application which discloses an embodiment corresponding to a scaled system with multiple intermediate layer servers of different types with associated load balancers).

Mulinder fails to teach direct communications between services such as the quote engine and credit check module. All traffic must flow through the flow manager

FIG. 2

Figure 2

Mulinder teaches a centralized architecture where all interactions between different software modules must occur through the "flow manager"

By contrast, the claimed invention, as recited in claims 1, 32 and 82, has a "de-centralized" peer-to-peer architecture where the WBO server, order server and quote server can all directly interact with each other (see Figure 3 for a larger scale arrangement with load balancers)

Applicant further notes that the cited Garg reference fails to bridge this gap left by Mulinder relative to the claimed invention. In fact, Applicant respectfully submits that Garg teaches away from the claimed invention at paragraph 91 where Garg teaches that "[n]o traffic
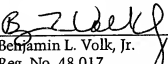
goes between servers in the same tier." Proceeding contrary to this teaching, the claimed invention permits traffic to flow between different servers in the intermediate layer (e.g., communications from the customer account server to the order server, etc.). Further still, at paragraphs 32 and 89, Garg teaches that servers within the same tier should have the same functionality, which also contrasts with the claims whereby different servers in the intermediate layer have different functionality (e.g., order server, customer account server, quote server).

     As such, Applicant respectfully submits that the obviousness rejections of the claims should be withdrawn.

Conclusion:

     For the foregoing reasons, Applicant respectfully submits that the pending claims are in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided below. Favorable action is respectfully requested.

                        Respectfully submitted,

                        Benjamin L. Volk, Jr.
                        Reg. No. 48,017
                        Thompson Coburn LLP
                        One US Bank Plaza
                        St. Louis, Missouri 63101-9928
                        (314) 552-6352
                        (314-)552-7352 (fax)